

1 JONES DAY
Koree B. Wooley, Bar No. 294489
2 kbwooley@jonesday.com
Cindi L. Ritchey, Bar No. 216899
3 critchey@jonesday.com
Jayce E. Gustafson, Bar No. 344961
4 jgustafson@jonesday.com
4655 Executive Drive
5 Suite 1500
San Diego, California 92121.3134
6 Telephone: +1.858.314.1200
Facsimile: +1.844.345.3178
7
8 Attorneys for Defendant
SAPUTO DAIRY FOODS USA, LLC

9 MATERN LAW GROUP PC
Matthew J. Matern, Bar No. 159798
10 mmatern@maternlawgroup.com
Mikael H. Stahle, Bar No. 182599
11 mstahle@maternlawgroup.com
Irina A. Kirnosova, Bar No. 312565
12 1230 Rosecrans Avenue, Suite 200
Manhattan Beach, California 90266
13 Telephone: +1.310.531.1900
Facsimile: +1.310.531.1901
14

15 Attorneys for Plaintiff
NATALY LOPEZ VARGAS

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17 **UNITED STATES DISTRICT COURT**
18 **EASTERN DISTRICT OF CALIFORNIA**
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20 NATALY LOPEZ VARGAS, an individual, on
behalf of herself and all others similarly
21 situated,

22 Plaintiff,

23 v.

24 SAPUTO DAIRY FOODS USA, LLC, a
Delaware limited liability corporation; and
25 DOES 1 through 10, inclusive,

26 Defendants.
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Case No. 1:22-cv-01645-DJC-JDP

**JOINT STATUS REPORT;
STIPULATION AND ORDER TO
MAINTAIN STAY PENDING FINAL
SETTLEMENT APPROVAL**

Complaint Filed: November 21, 2022

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

Defendant Saputo Dairy Foods USA, LLC (“Saputo” or “Defendant”) and Plaintiff Nataly Lopez Vargas (“Vargas” or “Plaintiff”) (collectively, the “Parties”), by and through their respective attorneys of record, submit the following Joint Status Report and Stipulation.

STATUS OF LAWSUIT

1. On November 26, 2024, the Court entered the Parties’ stipulation to maintain the stay of this action pending final approval of a global settlement that includes this action (“Global Settlement”), which the Parties are currently pursuing through the related action *Martinez v. Saputo Dairy Foods USA, LLC*, Case No. VCU294960 (Tulare Cnty. Sup. Ct.) (“*Martinez* PAGA Action”), and ordered the Parties to file a joint status report within fourteen days after the hearing on the Parties’ Motion for Final Approval of the Global Settlement (the “Final Approval Hearing”). (See ECF No. 35.)

2. On February 10, 2025, the Parties appeared for the Final Approval Hearing in the *Martinez* PAGA Action. The Court heard additional argument regarding Plaintiffs’ request for attorneys fees and took the Motion for Final Approval under submission. As of the filing of this status report, the Court has not yet issued a decision on the Motion for Final Approval.

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STIPULATION

IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. This action shall remain stayed pending final approval of the Global Settlement through the *Martinez* PAGA Action, Case No. VCU294960 (Tulare Cnty. Sup. Ct.).

2. In the event the court does not grant final approval of the Global Settlement in the *Martinez* PAGA Action, the Parties shall return to status quo as existed before this action was stayed.

3. The Parties will file a joint status report within fourteen days of a decision on the Motion for Final Approval of the Global Settlement in the *Martinez* PAGA Action.

IT IS SO STIPULATED.

Dated: February 24, 2025

JONES DAY

By: /s/ Koree B. Wooley

Koree B. Wooley

Attorneys for Defendant SAPUTO DAIRY
FOODS USA, LLC

Dated: February 24, 2025

MATERN LAW GROUP PC

By: /s/ Mikael H. Stahle (as authorized on 2/24/25)

Mikael H. Stahle

Attorneys for Plaintiff NATALY LOPEZ VARGAS

ORDER

Having considered the Joint Stipulation between all Parties, and good cause appearing,
IT IS SO ORDERED.

Dated: February 25, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE